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File No. 094451R**

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re: : **CHAPTER 7**
Cheryl Lynn Hall : **CASE NO. 20-10383-RG**
Debtor : **NOTICE OF MOTION**
: **TO VACATE STAY**
: **HEARING DATE: February 18, 2020**

TO: Donald V. Biase, Trustee, Cheryl Lynn Hall, Debtor.

PLEASE TAKE NOTICE that the undersigned, attorneys for the Mortgagee, MTGLQ Investors, LP, will apply to the above-named Court at the U.S. Bankruptcy Court House, Martin Luther King, Jr., Federal Building & Courthouse, 50 Walnut Street, 3rd Floor, Newark, New Jersey, in Courtroom #3E, on February 18, 2020, at 10:00 a.m., or as soon thereafter as counsel may be heard, for an Order to Vacate the Automatic Stay pursuant to II U.S.C. § 362.

This Motion is being submitted under Local Bankruptcy Rule 4001-1. An accompanying brief has not been submitted because Local Rule permits a Secured Creditor to file the instant Motion supported by a Certification attesting to the operative circumstances and the Movant's entitlement to the relief requested.

PLEASE TAKE FURTHER NOTICE that if you contest this Motion, you must appear in Court on the date noted above and you are further required to file with the Court and serve on the undersigned a written response, in accordance with Rules of Court, no later than seven (7) days prior to the hearing date pursuant to Local Bankruptcy Rule 9013-2(a)(2). If a written response is not served and filed, the Court will treat this Motion as uncontested and may not conduct a hearing.

PLUESE, BECKER & SALTZMAN, LLC

BY: /s/ Rob Saltzman
Rob Saltzman, Esquire

DATED: January 24, 2020